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U.S. DISTRICT COURT
DISTRICT OF MASS.

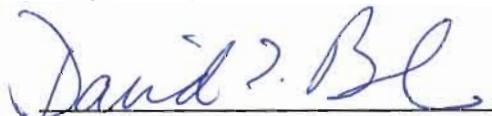
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

Defendant, Dzhokhar Tsarnaev, by and through counsel, requests that the Court include the attached jury instructions concerning (1) nondiscrimination and (2) victim impact evidence as part of the preliminary penalty phase instructions to the jury at the start of the sentencing phase of this case.

Respectfully submitted,



David I. Bruck
Judy Clarke
Miriam Conrad
Timothy Watkins
William Fick

April 13, 2015

Certificate of Service

I certify that the within requested instructions were personally served upon counsel for the government this date.



David I. Bruck